REMARKS

Applicants respectfully request reconsideration in view of the foregoing amendments to the claims and the following remarks.

STATUS OF THE CLAIMS

Claims 1-5, 7-15 and 17-22 are pending in this application. Of the pending claims, claims 1, 11, 21 and 22 are independent claims. All of the pending claims have been rejected. By this amendment, claims 1, 11, 21 and 22 have been amended. No new matter has been added.

REJECTIONS UNDER 35 U.S.C §112

In paragraph two (2) of the office action, claims 21 and 22 have been rejected under 35 U.S.C. §112, first paragraph, as containing subject matter which was not described in the specification. The Examiner indicated that the limitation "without using a gateway" of claims 21 and 22 is not described in the specification as originally filed.

Claims 21 and 22 have been amended to read the same portion "without converting data format". Applicants direct Examiner's attention to Fig. 2 which shows Agent 35 is connected to multiple communications networks through Agent Availability NCP 40. Fig. 3 and relevant portion of the specification (e.g., page 6, line 18 - page 7, line 10) further show that the functional block diagram of Agent Availability NCP 40 does not convert data format by using I/O Module 41. In fact, using the system of the present invention (i.e., Agent Availability NCP 40), an agent can be reached/connected via multiple networks without converting data format, i.e., any two networks are not communicating directly each other.

Accordingly, Applicants believe that claims 21 and 22, as amended, are supported by

- 4 -

the specification as originally filed.

REJECTIONS UNDER 35 U.S.C §103

In paragraph five (5) of the office action, claims 1, 2, 4, 5, 11, 12, 14 and 15 have been

rejected under 35 U.S.C.§103(a) as being unpatentable over U.S. Patent No. 6,173,053 to

Bogart et al. (hereinafter "Bogart") in view of U.S. Patent No. 5,892,764 to Riemann et al.

(hereinafter "Riemann").

As the Examiner admitted, Bogart fails to teach that each of the agents is connected to

disparate telecommunications networks and that agent availability is reported as claimed in

claims 1 and 11. Riemann is cited by the Examiner as disclosing a distributed private branch

exchange, comprising a telephony server, that connects disparate telecommunications

network.

Riemann discloses a distributed private branch exchange (PBX) over a local area

network (LAN) in which a computer telephone integration (CTI) is utilized integrating the

PBX and LAN. Network Server 12 of Riemann connects ATM Switch 14 with PSTN 16

converting data formats from each network.

Riemann, however, fails to show or suggest the deficiency of Bogart that each of the

agents is connected to disparate telecommunications networks. There is nothing in Riemann

to show or suggest a method or a system by which an agent in a call center can be reached

through a plurality of telecommunications networks as claimed in claims 1 and 11 of the

present invention. Riemann's Network Server 12 simply interfaces between PSTN 16 and

ATM switch 14 for direct communication between the two networks.

Accordingly, neither Bogart nor Riemann shows or suggest a method or a system in

which an agent can be reached from one of a plurality of telecommunications networks where

659804 v1

the agent is connected to each of the plurality of telecommunications networks as specifically claimed in claims 1 and 11 of the present invention.

None the less, Applicants amended claims 1, 11, 21 and 22 for further clarification of the invention over the cited art of record. Each of claims 1, 11, 21 and 22, as amended, incorporates a feature of responding to the query with a "connection information" of a determined agent thereby the agent can be connected through the telecommunication network from which the query was received. Support for the amendment may be found, for example, in page 7, first full paragraph and page 8, first full paragraph).

Applicants believe that claims 1, 11, 21 and 22 are not anticipated by nor rendered obvious in view of Bogart and Riemann, singularly or in combination, for at least the reasons discussed above.

Reconsideration and allowance of independent claims 1, 11, 21 and 22 are respectfully solicited.

Applicants have not individually addressed the rejection of the dependent claims because Applicants believe that the foregoing amendments places the independent claims from which they depend in condition for allowance. Applicants, however, reserve the right to address such rejections of the dependent claims should such be necessary.

CONCLUSION

Based on the foregoing amendments and remarks, Applicants respectfully request

reconsideration and allowance of this application. In the event that a telephone conference

would facilitate examination of this application in any way, the Examiner is invited to contact

the undersigned at the number provided.

Respectfully submitted,

MORGAN & FINNEGAN

Dated: October 26, 2001

By: _____
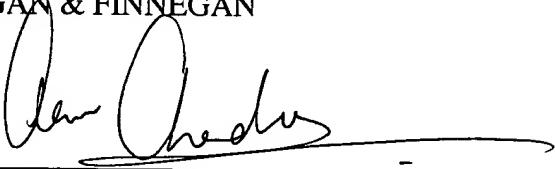
Arun Chandra
Registration No. 43,537

CORRESPONDENCE ADDRESS:
MORGAN & FINNEGAN L.L.P.
345 Park Avenue
New York, New York 10154
(212) 758-4800

VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS

Please amend claims 1, 11, 21 and 22 as follows.

1. (Three Times Amended) A method for connecting a call to one of a plurality of agents in a call center that is connected to disparate telecommunications networks, the method comprising the steps of:

receiving a query from one of a plurality of telecommunications networks regarding whether at least one agent, among the plurality of agents, is available, each telecommunications network being a disparate telecommunications network with respect to other telecommunications networks of the plurality of telecommunications networks, the agent being coupled to each disparate telecommunications network;

[responding to the query with a determined availability of any available agents;]

determining which available agent is to be connected based on the availability of the agent as well as one of an agent skill level and a most idle agent criteria; [and]

responding to the query with a connection information of a determined agent; and

connecting the call to the determined agent.

11. (Three Times Amended) A system comprising:

at least one agent, among a plurality of agents in a call center, receiving calls from at least two disparate telecommunications networks; and

- 8 -

a processor coupled to the at least one agent and to each telecommunications network from which the agent receives calls, the processor receiving a query from a telecommunications network regarding whether at least one agent among the plurality of agents is available, determining the at least one agent based on the availability of the agent as well as one of an agent skill level and a most idle agent criteria, and responding to the query with [the determined availability] a connection information of the at least one agent.

21. (Amended) A method for connecting a call to one agent among a plurality of agents in a call center, the method comprising the steps of:

(i)   receiving a query from one of a plurality of telecommunications networks requesting connection of the call to one agent of the plurality of agents, each telecommunications network being a disparate telecommunications network with respect to other telecommunications networks of the plurality of telecommunications networks, the agent being coupled to each disparate telecommunications network without [using a gateway] converting data format;

(ii)   determining the availability of the plurality of agents where if an agent is not in communication with at least one of the plurality of the telecommunication networks, it is determined available; [and]

(iii)   responding to the query with a connection information of a determined agent; and

[(iii)] (iv)   connecting the call to [an available] the determined agent.

22. (Amended) A system comprising:

(i)   at least one agent, among a plurality of agents in a call center, receiving calls from at least two disparate telecommunications networks;

(ii)   a processor coupled to at least one agent among the plurality of agents and to each telecommunications network from which the at least one agent receives calls without [using a gateway] <u>converting data format</u>, the processor configured to:

(a)   receive a query from one of the at least two disparate telecommunications network regarding whether at least one agent, among the plurality of agents, is available;

(b)   [determining] <u>determine</u> the availability of the plurality of agents based on status whether or not an agent is in communication with one of the at least two disparate telecommunication network; and

(c)   [responding] <u>respond</u> to the query with [the determined availability] <u>a connection information</u> of an agent.